

**Notification of Compliance Status Report
Associated Electric Cooperative, Inc. - New Madrid Power Plant
Units 1 & 2 HCl and PM Performance Tests**

National Emission Standards for Hazardous Air Pollutants (NESHAP):
Coal and Oil-Fired Electric Utility Steam Generating Units
40 CFR Part 63 Subpart UUUUU – Mercury and Air Toxics Standards (MATS)

What is the purpose of this form?

The Mercury and Air Toxics Standards requires affected sources demonstrate initial compliance with each emissions limit that applies by conducting performance tests as specified in §63.10011. As expressed in §63.10011(c)(1), for units using a sorbent trap monitoring system to monitor mercury (Hg), performance tests must be performed on a certified system. The certification was accomplished through a performance evaluation. This Notification of Compliance Status is being submitted to satisfy the reporting requirements of the performance evaluation as per §63.10031(f)(1). The Notification of Compliance Status report must contain all of the information specified in §63.10030, paragraphs (e)(1) through (8), as applicable.

SECTION I: DESCRIPTION OF AFFECTED SOURCE(S) (§63.10030(e)(1))

| Unit ID | SUBCATEGORY OF SOURCE | DESIGN CAPACITY | DESCRIPTION OF ADD-ON CONTROLS | DESCRIPTION OF FUELS BURNED | IS THE FUEL A NON-HAZARDOUS SECONDARY MATERIAL? (YES/NO) |
|---------|-----------------------|----------------------------------|--|-----------------------------|--|
| 1 | Coal-Fired Unit | 638 MW (Gross) 6340 MMBtu/hr. | <ul style="list-style-type: none"> Activated Carbon Injection (ACI) Over Fire Air (OFA) Selective Catalytic Reduction (SCR) Electrostatic Precipitator (ESP) | Subbituminous Coal | No |
| | | | | Fuel Oil No 1 | No |
| | | | | Fuel Oil No 2 | No |
| 2 | Coal-Fired Unit | 642 MW (Gross) 6340 MMBtu/hr. | <ul style="list-style-type: none"> Activated Carbon Injection (ACI) Over Fire Air (OFA) Selective Catalytic Reduction (SCR) Electrostatic Precipitator (ESP) | Subbituminous Coal | No |
| | | | | Fuel Oil No 1 | No |
| | | | | Fuel Oil No 2 | No |

Notes: New Madrid Units 1 and 2 primarily burn sub-bituminous coal and use No.1 or No. 2 fuel oils in unit start-up processes. The Missouri Department of Natural Resources issued the Permit to Operate for the New Madrid Power Plant. At the time of the performance evaluation, Units 1 and 2 were burning sub-bituminous coal, as it is the primary fuel source.

SECTION II: SUMMARY OF TEST RESULTS (§63.10030(e)(2))

Table 1: Summary of MATS Emissions New Madrid Unit 1

| Test Date | Constituent | Emissions (lb/MWh) | Load (Average MW) | MATS LEE Limit (lb/MWh) |
|---------------|-------------|--------------------|-------------------|-------------------------|
| June 20, 2017 | Particulate | 0.015 | 602 | 0.15 |
| June 22, 2017 | HCl | 0.004 | 615 | 0.01 |

Table 2: Summary of MATS Emissions New Madrid Unit 2

| Test Date | Constituent | Emissions (lb/MWh) | Load (Average MW) | MATS LEE Limit (lb/MWh) |
|---------------|-------------|--------------------|-------------------|-------------------------|
| June 21, 2017 | Particulate | 0.12 | 615 | 0.15 |
| June 29, 2017 | HCl | 0.004 | 586 | 0.01 |

* Notes: Units 1 and 2 are currently demonstrating compliance for Hg emissions by performing a 30-boiler operating day emissions average test as specified in Table 5 to Subpart UUUUU of Part 63.

SECTION III: COMPLIANCE DEMONSTRATION METHOD (§63.10030(e)(3))

New Madrid Units 1 and 2 are designated as part of the coal-fired unit, low rank virgin coal subcategory and are subject to emission limits for filterable particulate matter (PM), hydrogen chloride (HCl), and mercury (Hg). Initial and ongoing compliance with PM will be demonstrated through performance testing using EPA methods 1, 2, 3A, 4 and 5. Initial and ongoing compliance with HCl will be demonstrated through performance testing using EPA methods 1, 2, 3A, 4 and 26A. Initial and ongoing compliance with Hg will be demonstrated through performance evaluation of the system using EPA methods 1 and 30B, and through performance tests as specified in table 5 to subpart UUUUU of Part 63. The fuel-specific default moisture percentage of 8% for sub-bituminous coal, as defined in §75.11(b)(1), will be applied to determine the hourly carbon dioxide (CO₂) concentration to demonstrate compliance with Hg.

SECTION IV: EMISSIONS AVERAGING (§63.10030(e)(4))

New Madrid Units 1 and 2 do not plan to demonstrate compliance with Hg, PM or HCl through emissions averaging.

SECTION V: DEVIATIONS (§63.10030(e)(6))

There were no deviations from any emission limit, work place standard, or operating limits for New Madrid Units 1 and 2.

SECTION VI: STARTUP DEFINITION (§63.10030(e)(8))

New Madrid Unit 1 and 2 rely on the startup definition, paragraph (1) in §63.10042.

Startup Paragraph (1): Either the first-ever firing of fuel in a boiler for the purpose of producing electricity, or the firing of fuel in a boiler after a shutdown event for any purpose. Startup ends when any of the steam from the boiler is used to generate electricity for sale over the grid or for any other purpose (including on-site use). Any fraction of an hour in which startup occurs constitutes a full hour of startup

SECTION VII: CERTIFICATION AND NOTIFICATION OF COMPLIANCE STATUS UNDER THE COAL AND OIL-FIRED ELECTRIC UTILITY NESHAP (§63.10030(e)(5); (§63.10030(e)(7))

Check the applicable boxes:

1. ☒ The electric utility steam generating units (EGU) referenced in Section I and Section II, have met all applicable emissions limits of 40 CFR Part 63, Subpart UUUUU.
2. ☒ The electric utility steam generating units (EGU) referenced in Section I and Section II complies with the requirements in §63.10021(a) to demonstrate continuous compliance.

SECTION VIII: FACILITY INFORMATION AND CERTIFICATION BY RESPONSIBLE OFFICIAL (§63.10030(e)(7))

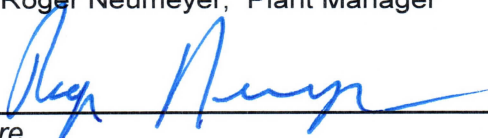
Facility Name: New Madrid Power Plant

Facility Street Address: 41 St. Jude Industrial Park, Marston, MO 63866

Contact Email Address: kfarmer@aeci.org

- ☒ No secondary materials that are solid waste were combusted in any affected unit.
- ☒ I certify that my facility has complied with the relevant standards of 40 CFR part 63, subpart UUUUU. See §63.9(h)(2)(i)(G).
- ☒ I certify that the information presented herein is true, accurate, and complete to the best of my knowledge. See §63.9(h)(2)(i).

Name: Roger Neumeyer, Plant Manager


Signature

DATE: 8/25/17

To whom do I submit this notification?

- a. If a title V permit has been issued for your facility, submit a copy of this notification to the appropriate permitting authority.
- b. If your State has been delegated the authority for this regulation under section 112(I) of the Clean Air Act^a submit the notification to your State agency found at the following link:
http://www.epa.gov/ttn/atw/area/table_state_contacts.doc

If your state/local contact is not listed at the above link, go to:

<http://www.4cleanair.org/contactUsaLevel.asp>

- c. If your state has not been delegated the authority for this rule, submit the notification to the appropriate EPA Regional Office, from list below:

EPA Region I (Connecticut, Maine, Massachusetts, New Hampshire, Rhode Island, Vermont)

5 Post Office Square, Suite 100, Mail code: OES04-2,
Boston MA 02109-3912 Attention: Air Clerk

EPA Region II (New Jersey, New York, Puerto Rico, Virgin Islands)

Director, Division of Enforcement and Compliance Assistance
290 Broadway, New York, NY 10007-1866

EPA Region III (Delaware, District of Columbia, Maryland, Pennsylvania, Virginia, West Virginia)

Director, Air Protection Division, 1650 Arch Street, Philadelphia, PA 19103

EPA Region IV (Alabama, Florida, Georgia, Kentucky, Mississippi, North Carolina, South Carolina, Tennessee)

Director, Air, Pesticides and Toxics Management Division
Atlanta Federal Center, 61 Forsyth Street, Atlanta, GA 30303-3104

EPA Region V (Illinois, Indiana, Michigan, Minnesota, Ohio, Wisconsin)

Director, Air and Radiation Division, 77 West Jackson Blvd., Chicago, IL 60604-3507

EPA Region VI (Arkansas, Louisiana, New Mexico, Oklahoma, Texas)

Director, Air, Pesticides and Toxics, 1445 Ross Avenue, Dallas, TX 75202-2733

EPA Region VII (Iowa, Kansas, Missouri, Nebraska)

Director, Air and Waste Management Division, U.S. Environmental Protection Agency
901 N. 5th Street, Kansas City, KS 66101

EPA Region VIII (Colorado, Montana, North Dakota, South Dakota, Utah, Wyoming)

Director, Air and Toxics Technical Enforcement Program, Office of Enforcement, Compliance and Environmental Justice, 1595 Wynkoop Street, Denver, CO 80202-1129

EPA Region IX (Arizona, California, Hawaii, Nevada, American Samoa, Guam)

Director, Air and Toxics Division, 75 Hawthorne Street, San Francisco, CA 94105

EPA Region X (Alaska, Idaho, Oregon, Washington)

Director, Office of Air, Waste and Toxics, 1200 6th Ave., Suite 900, AWT-107, Seattle, WA 98101

^a To determine whether your State has been delegated the authority for this regulation under section 112(I) of the Clean Air Act, contact your EPA Regional Office.